

NATALIE LYONS (SBN 293026)  
VESS A. MILLER (SBN 278020)  
LYNN A. TOOPS (*pro hac vice* application  
forthcoming)  
LISA M. LA FORNARA (*pro hac vice*  
application forthcoming)  
**COHENMALAD, LLP**  
*nlyons@cohenmalad.com*  
*vmiller@cohenmalad.com*  
*ltoops@cohenmalad.com*  
*llaforlara@cohenmalad.com*  
One Indiana Square, Suite 1400  
Indianapolis, Indiana 46204  
Tel.: +1 317 636 6481

[*additional counsel listed on signature page*]

Attorneys for Plaintiff

ALLISON J. SCHOENTHAL (admitted *pro hac vice*)  
*ASchoenthal@goodwinlaw.com*  
**GOODWIN PROCTER LLP**  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018  
Tel.: +1 212 459 7183  
Fax: +1 212 937 3850

W. KYLE TAYMAN (admitted *pro hac vice*)  
*KTayman@goodwinlaw.com*  
**GOODWIN PROCTER LLP**  
1900 N Street, N.W.  
Washington, DC 20036-1612  
Tel.: +1 202 346 4000  
Fax: +1 202 346 4444

REBECCA L. TARNEJA (SBN 293461)  
*RTarneja@goodwinlaw.com*  
**GOODWIN PROCTER LLP**  
601 South Figueroa Street, Suite 4100  
Los Angeles, California 90017  
Tel.: +1 213 426 2500  
Fax: +1 213 623 1673

Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

MARTIN BELTRAN, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

NATIONSTAR MORTGAGE LLC d/b/a MR.  
COOPER,

Defendant.

Case No. 3:25-cv-04412-JSC

**JOINT STIPULATION AND**  
**~~[PROPOSED]~~ ORDER RE:**  
**SUPPLEMENTAL BRIEFING**  
**SCHEDULE FOR (1) MOTION TO**  
**TRANSFER AND (2) MOTION TO**  
**DISMISS AMENDED COMPLAINT**

Judge: Honorable Jacqueline Scott Corley  
Location: 8, 19th Floor

**STIPULATION**

Pursuant to Civil L.R. 7-12, Defendant Nationstar Mortgage LLC d/b/a Mr. Cooper (“Mr. Cooper”) and Plaintiff Martin Beltran (“Plaintiff”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, on May 23, 2025, Plaintiff filed the initial Complaint (ECF 1);

WHEREAS, on June 17, 2025, Plaintiff filed a Waiver of Service of Summons, dated as sent on June 17, 2025 (ECF 12);

WHEREAS, on August 18, 2025, Mr. Cooper filed a (1) motion to transfer venue, pursuant to 28 U.S.C. § 1404(a) (the “Motion to Transfer”) (ECF 24), and (2) motion to dismiss the Complaint (ECF 25);

WHEREAS, on August 18, 2025, the Court granted the Parties’ stipulation and ordered a briefing schedule for the Motion to Transfer (ECF 24) and Motion to Dismiss the Complaint (ECF 25);

WHEREAS, on September 8, 2025, Plaintiff filed the Amended Complaint (ECF 26);

WHEREAS, on September 15, 2025, the Court granted the parties’ joint request for a briefing schedule on the Motion to Transfer and Motion to Dismiss the Amended Complaint (ECF 28);

WHEREAS, Mr. Cooper timely filed its opening brief (ECF 30) and Plaintiff timely filed his opposition brief (ECF 40) to the Motion to Dismiss;

WHEREAS, Plaintiff timely filed his opposition brief (ECF 29) and Mr. Cooper timely filed its reply brief (ECF 36) to the Motion to Transfer and the Parties argued that Motion before the Court on November 20, 2025;

WHEREAS, during the November 20, 2025 hearing, the Court ordered that the Parties submit supplemental briefing on the Motion to Transfer and to submit a stipulation on a supplemental briefing schedule on the Motion to Transfer and the pending Motion to Dismiss (ECF 42);

WHEREAS, the parties have conferred on and agreed to a briefing schedule for the supplemental briefing;

1 NOW, THEREFORE, the Parties hereby agree and stipulate to the following supplemental  
2 briefing schedule on the Motion to Transfer and Motion to Dismiss:

3 • **Motion to Transfer**

- 4 ○ January 16, 2026: Opening Supplemental Briefs  
5 ○ February 20, 2026: Response Supplemental Briefs

6 • **Motion to Dismiss**

- 7 ○ The hearing set for January 29, 2026 is vacated, and the reply brief is not due on  
8 December 10, 2026.  
9 ○ If the Motion to Transfer is denied, (i) the reply brief will be due 30 days after the order  
10 on the Motion to Transfer, and (ii) the Parties will reserve a new hearing date based on  
11 their mutual availability.  
12 ○ If the Motion to Transfer is granted, the Parties will meet and confer to discuss  
13 completion of the briefing and any hearing after transfer to the Northern District of  
14 Texas.

15  
16 IT IS SO STIPULATED.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: November 25, 2025

By: /s/ Rebecca L. Tarneja

REBECCA L. TARNEJA (SBN 293461)  
W. KYLE TAYMAN (admitted *pro hac*  
*vice*)  
ALLISON J. SCHOENTHAL (admitted  
*pro hac vice*)  
*RTarneja@goodwinlaw.com*  
*KTayman@goodwinlaw.com*  
*ASchoenthal@goodwinlaw.com*

**GOODWIN PROCTER LLP**

Attorneys for Defendant

Dated: November 25, 2025

/s/ Natalie Lyons

NATALIE LYONS (SBN 293026)  
VESS A. MILLER (SBN 278020)  
LYNN A. TOOPS (*pro hac vice*  
application forthcoming)  
LISA M. LA FORNARA (*pro hac vice*  
application forthcoming)  
*nlyons@cohenmalad.com*  
*vmiller@cohenmalad.com*  
*ltoops@cohenmalad.com*  
*llafornara@cohenmalad.com*

**COHENMALAD, LLP**

J. GERARD STRANCH (*pro hac vice*  
application forthcoming)  
EMILY E. SCHILLER (*pro hac vice*  
application forthcoming)  
*gstranch@stranchlaw.com*  
*eschiller@stranchlaw.com*

**STRANCH, JENNINGS & GARVEY,  
PLLC**

SAMUEL J. STRAUSS (*pro hac vice*  
application forthcoming)  
RAINA C. BORRELLI (*pro hac vice*  
application forthcoming)  
*sam@straussborrelli.com*  
*raina@straussborrelli.com*

**STRAUSS BORRELLI, PLLC**

Attorneys for Plaintiff

~~PROPOSED~~ ORDER

Pursuant to stipulation, and for good cause shown, IT IS SO ORDERED.

Dated: November 25, 2025

  
JACQUELINE SCOTT CORLEY  
UNITED STATES DISTRICT JUDGE